



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

SDMS Document



109055

June 5, 2003

Mark Nielsen, P.E.  
Environ  
214 Carnegie Center  
Princeton, New Jersey 08540-6284

Re: Cornell-Dubilier Electronics Superfund site  
South Plainfield, New Jersey

Dear Mark:

This is in response to your letter, dated March 21, 2003, wherein you provide comments on behalf of Dana Corporation and Cornell Dubilier Electronics, Inc., on the Remedial Alternatives Screening Technical Memorandum for Operable Unit 2 (OU2) at the Cornell-Dubilier Electronics (CDE) Superfund site.

Based on your review of the above-referenced document, you raise several concerns regarding the technologies that the U.S. Environmental Protection Agency (EPA) is evaluating to address the on-site soils and buildings. Specifically, you are concerned that the physical and chemical heterogeneity of the on-site soils could interfere with the feasibility, effectiveness, and safety of non-containment remedies. As I had indicated during the last public information session that was held in South Plainfield on January 30, 2003, EPA will be evaluating various alternatives to remediate the site. These alternatives, which include containment and non-containment technologies, could potentially include a combination of technologies to address the heterogeneity of the on-site soils. EPA will discuss these alternatives in greater detail during the next public information session.

Secondly, you raise a concern that the implementation of an excavation or other large-scale intrusive remedy could pose a danger to workers excavating and handling wastes, as well as the neighborhoods through which excavated hazardous materials may be transported. Please be assured that prior to the implementation of any remedial action at the site, a site specific health and safety program will be developed and will address the measures necessary for protection against the hazards you describe. As you know, short-term effectiveness is one criteria by which viable remedial alternatives are evaluated, so this issue will be evaluated in greater detail in the FS.

400322

Lastly, your letter states that "identifying the reasonably anticipated future use of the land is an important consideration in the Superfund cleanup process and the first step for integrating reuse plans into a cleanup." Specifically, you raise a concern that while the screening memorandum recognizes that a remedial action objective is to allow the beneficial use of the property, it contains little discussion of how the various technologies could impact reuse of the site.

This last comment suggests a potential misunderstanding concerning the purpose of the screening memorandum. This is understandable, since typically a document of this nature would not be publically distributed. The screening memorandum is merely an initial screening of technologies. Its purpose is to identify those technologies which should be eliminated because they can not be implemented technically at the site and those technologies which should be carried forward for a detailed analysis and evaluation. Therefore, the screening memorandum identifies those technologies that, if implemented at the site, would not interfere with the future use of the property. It would not be appropriate for the screening memorandum to contain the detailed information described in your letter, such as a discussion of how the potential remedial alternatives could impact reuse of the Site. However, EPA would gladly review any information that you can provide which indicates that a technology being evaluated does not allow for the beneficial reuse of the property. That information will be relevant as the Feasibility Study for OU2 proceeds.

For your information, EPA has responded separately to the letter of Michael Last dated March 21, 2003, reiterating your points and raising other issues.

Please feel free to contact me at 212-637-4395 if you have any additional comments or questions.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Peter M", followed by a long horizontal line.

Peter Mannino, Remedial Project Manager  
Central New Jersey Remediation Section

cc: Michael Last, Esq.